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BY MESSENGER

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: Docket No. 99-271

Dear Ms. Cottrell:

I write on behalf of AT&T Communications of New England, Inc., ("AT&T") to request that the Department reconsider its Letter Order dated May 12, 2000, with respect to the need for production environment volume testing of Bell Atlantic's new set of Operations Support Systems ("OSSs") designed to comply with the Local Service Ordering Guidelines, Release 4 ("LSOG 4"). I enclose three copies with the original of this letter.

At the outset, I want to emphasize that AT&T appreciates that the Department and KPMG have already expanded the scope of ongoing OSS testing to include feature and functionality testing of LSOG 4 systems in the production environment. This is an important step toward ensuring that Bell Atlantic's OSSs will be ready to handle commercial volumes of CLEC transactions.

We respectfully ask that the Department reconsider its May 12 Letter Order, however, because the decision appears to be based on a key mistake of fact. The Letter Order states that the Department's conclusion – that full volume testing of LSOG 4 is not needed – was based on Bell Atlantic's representation "to the Department and KPMG that since both LSOG 2/3 and LSOG 4 *share the same front-end systems*, volume testing results for LSOG 2/3 are applicable to LSOG 4" (emphasis added). This statement is incorrect, and thus the decision regarding LSOG 4 volume testing is based on a flawed factual premise.

Bell Atlantic has announced that one of the key differences between its LSOG 4 systems and its old OSSs is that LSOG 4 will scrap DCAS – the Direct Customer Access System, which is one of the key LSOG 2/3 OSSs in Bell Atlantic-North ("BA-North"), the old NYNEX territory – and for the first time replace it with a BA-South system called "Request Manager". This is undisputed.

Because DCAS is being replaced by Request Manager, it is simply not true that LSOG 4 will "share the same front-end systems" that had been in use in Bell Atlantic-

Mary L. Cottrell
June 15, 2000
Page 2

North under LSOG 2/3. Bell Atlantic's own OSS witness explained during last Fall's technical session that DCAS is the key part of Bell Atlantic-North's current front-end "gateway systems," and under LSOG 2/3 performs order validation, determines whether an order is a candidate for flow-through processing, and routes each order to the proper systems destination for further processing. *See* Tr. 11/22/99 at 2054 (Stuart Miller). Request Manager is being substituted to perform the same functions in the LSOG 4 systems. This means that in Massachusetts, as in the rest of the old NYNEX region, Bell Atlantic's LSOG 4 OSSs have significantly different front-end systems than the LSOG 2/3 OSSs.

In short, Bell Atlantic's assertion that volume testing of the LSOG 2/3 systems will be fully applicable to LSOG 4 is simply not correct.

Thus, without independent volume testing of the LSOG 4 OSSs, Massachusetts consumers will be subjected to the risk that OSSs which seem to work in production environment feature and functionality testing will break down at a later date under commercial volumes. This is not a theoretical concern. It is exactly what happened in New York this Spring. Volume testing of LSOG 4 OSSs by KPMG is critical to ensure that Bell Atlantic's current LSOG 4 OSSs are able to handle commercial volumes.

In sum, the basis for the Department's decision on LSOG 4 volume testing, as stated in the May 12 Letter Order, appears to have been the result of mistake or inadvertence. For this reason, AT&T respectfully requests that the Department reconsider its prior determination and direct KPMG to conduct full volume and stress testing of Bell Atlantic's LSOG 4 OSSs.

Very truly yours,

Kenneth W. Salinger

pc: Commissioner Paul Vasington
Hearing Officer Cathy Carpino (w/ two copies)
Hearing Officer Tina Chin (w/ two copies)
Michael Isenberg, Director, Telecommunications Division
Scott Simon
Service List